

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Katherine Renee Regions, Debtor

**Case No. 25-00332-JAW
CHAPTER 13**

RESPONSE

COMES NOW, Debtor, by and through counsel, and responds to Creditor, Trustmark National Bank's Motion to Lift Automatic Stay as the Debtor and for Abandonment or Alternatively for Adequate Protection Including the Right to File an Amended Proof of Claim for Fees and Costs (Dk #22) as follows:

1. Debtor commenced this case on 02/06/2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor can continue making the payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on August 4, 2025, to:

By Electronic CM/ECF Notice:

Harold Barkley
James Renfroe on behalf of Creditor

/s/ Thomas C. Rollins, Jr. _____
Thomas C. Rollins, Jr.